

## **Exhibit L**

**DECLARATION UNDER PENALTY OF PERJURY  
PURSUANT TO 28 U.S.C. § 1746**

1. My name is Dr. Keme Hawkins. I am over eighteen years of age and competent to testify to the matters contained herein.
2. I am a resident of DeKalb County in Georgia and my residence address is 5070 Peachtree Boulevard, Unit 1203, Chamblee, GA 30341.
3. On September 24, 2019 which was Voter Registration Day, my roommate and I checked our voter registrations on the Secretary of State's website. I discovered that the address listed on my voter registration had been changed from my correct street name to an incorrect street name. My roommate's address was correct on her voter registration. My roommate and I check our voter registration status regularly, and my address had been correct when I checked it the previous month in August 2019.
4. I completed a change of address on the Secretary of State's My Voter Page website. The website said it might take 2-4 weeks for the address change to go into effect and that I needed to scan my driver's license and submit it so that they could match the signature. But the website did not have a method to submit the driver's license.
5. I immediately called the Secretary of State's Office and told the woman who answered the phone what happened. She told me that it was probably fine, but that I could call my county Board of Elections.

6. I then called the DeKalb Board of Elections and spoke to Wanda Drake. Ms. Drake asked me to email her a request to change my address on the voter registration records. I emailed Ms. Drake right away, and she responded that she had updated my record and sent me an electronic copy of my voter registration card. She told me that a copy of the voter registration card would be sent to me by US Mail and would arrive in 2-4 weeks. A copy of our email correspondence is attached to this affidavit as Exhibit A.
7. I contacted Fair Fight Action to inform them that my address had been changed to an incorrect address on the voter registration rolls but that I discovered the error and was able to have it corrected. Fair Fight Action asked me to sign a declaration describing this and also describing an experience I had at the polls in a runoff election. My deposition was taken on November 1, 2019 by a lawyer for the Secretary of State's Office.
8. I voted on November 5, 2019 without incident. I never received the voter registration card that Ms. Drake said would be mailed to me, but I was able to use my driver's license to check in to vote.
9. I was traveling a lot in November and my mail got backed up. Right before Thanksgiving, my roommate checked our mail and said, "you've got mail—I think it's your voter registration card." I opened the letter that we thought was my voter registration card after the Thanksgiving weekend. I was

shocked to see that the letter was not a voter registration card, but a notice telling me that my voter registration status would become inactive unless I completed and returned the included form within thirty days. I was shaken when I opened that mailing. It was scary. I thought, “Oh my god, they’re trying to make me inactive.” I thought I had resolved the issue of my voter registration two months ago and now my status as an active voter was being challenged. A copy of this mailing is attached as Exhibit B.

**10.**I felt like I needed to reach out to Fair Fight Action to make sure that someone knew what was happening to me and could help me. The letter challenging my voter registration status arrived two weeks after I was deposed by the Secretary of State, and I worried that it was sent to me because of that deposition. The transcript of my deposition had a heading with my name vs. Secretary of State Brad Raffensperger. It was terrifying to see this same name and title on a notice telling me that I might be purged from the voter rolls.

**11.**A staff member from Fair Fight Action checked my voter registration status on the Secretary of State’s website, and it was not listed as inactive. The staff member also checked for my name on the list of inactive voters released by the Secretary of State’s Office, and my name was not included on this list.



12. On Wednesday December 4<sup>th</sup>, I called Wanda Drake, the woman at the DeKalb Board of Elections who changed my address in September and left a voice mail explaining that I had received a purge letter. I then called the general DeKalb Board of Elections phone number and spoke to Tenisha. Tenisha said that this letter was sent because my street address had been wrong but that it had been corrected. She said that I was not on the inactive voter list. I asked what would happen if I didn't not send back the reply within thirty days. Tenisha said that nothing would have happened if I didn't send back the reply.
13. A little while later, Wanda Drake called me back. I asked her if she would allow me to conference in someone from Fair Fight Action. Ms. Drake seemed surprised by this question. She got jittery and stammered. She then said, "I've got to call you back." My roommate could hear this conversation and made the observation that Ms. Drake got nervous and needed to check with a supervisor.
14. Ms. Drake did not call me back. Instead, Twyla Hart called. Ms. Hart told me that there was an error with DDS. I had to ask what that meant, and she clarified that there was an error in my street address. Ms. Hart said that when my voter registration address was corrected in September 2019 my mailing address was not corrected on the voter registration rolls. So, when the voter

registration card was mailed to me, it was sent to an incorrect address and was returned as undeliverable. This is what triggered the purge notice I received after Thanksgiving. Ms. Hart also said something about me being on inactive status in 2013 but that my voter registration is current now. I didn't understand this at all because I remember voting for President Obama in 2012. It was getting hard to process everything Ms. Hart said because she was giving me so much information. Ms. Hart said she would email me a summary of everything she told me.

**15.** I asked Ms. Hart if I needed to send back the response card that was included in the mailing saying I was inactive. She said that I did not need to send it back but that I could if I wanted to make sure to dot my "i"s and cross my "t"s. I also asked if the mailing I received was the same as the purge letters the Secretary of State's Office announced that they were sending out. Ms. Hart told me that the return address and something else were different on the letter that I received. She indicated that my letter was the standard letter that is triggered when mail from the Board of Elections is returned as non-deliverable. A copy of the email Ms. Hart sent to me explaining what happened is attached as Exhibit C.

**16.** I am still very concerned by the mailing. It was from the Secretary of State threatening to take away my right to vote just two weeks after I was deposed

for reporting problems I experienced voting. I know everyone at the DeKalb Board of Elections told me the letter was sent because of a clerical error, but I honestly don't believe this is a coincidence. Isn't the goal to make things look innocuous? I am concerned that there is some trickery or subterfuge behind this clerical error. It seems quite suspicious.

17. I would feel better if there were some kind of acknowledgement by the Board of Elections or the Secretary of State that what is happening to me is crazy. I would like some sort of assurance that they are taking my right to vote seriously and are working to protect it. Instead, I feel like I am constantly having problems with my voter registration and have to be vigilant in protecting it. And while everyone who administers my right to vote is polite, everyone seems very casual in their handling of my sacred right. In my first declaration, I talked about how I called the Secretary of State's Office and they told me my voter registration was probably OK but that I could call my county board of elections if I was concerned. Then Tenisha at the DeKalb Board of Elections told me that it would be fine if I didn't return the card that was sent to me telling me that the Secretary of State would purge me if I didn't return it. And Ms. Hart told me I didn't really need to send back the card but that I could in an abundance of caution. I don't feel empowered or encouraged to ask for clarity. Don't the people who



administer our right to vote want to appear trustworthy? I feel like I am being asked to blindly trust all of these different people to protect my right to vote. I have a master's degree in African American studies. I know what people went through for the right to vote and how many cunning and conniving things were done to keep people from voting. And now I'm being told it was just a clerical error, and I should trust that my right to vote is secure.

**18.**I feel scared about the idea that I am going to need to do another deposition.

I am worried that my name will be out there for the Secretary of State to target. I understand the necessity of fighting for the right to vote and I will do it, but I wonder about drawing attention to myself. I feel like I'm creating more opportunities to be looked at like a threat and a target. The history of suppression of African American voters and the lengths people will go to in order to suppress the vote validates my anxieties.

**19.**The people at the Board of Elections were so nonchalant about my voter registration status. But I definitely don't feel nonchalant. Maybe the Board of Elections is nervous about the level of scrutiny my inquiries triggered. But I also feel nervous that I am now under scrutiny. It's like I'm poking the bear, but I don't have a choice. Knowing the legacy of voting, I can't take this lightly. I see voting as a sacred right. At the Human Rights Museum,



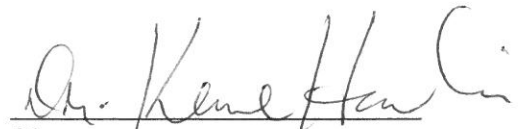
after all of the exhibits showing atrocities, the museum ends by saying that what people can do to make change is to vote. I feel like I am constantly battling for that right.

**20.** I give this Declaration freely, without coercion, and without any expectation of compensation or other reward.

**21.** I understand that in giving this Declaration, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway as anything other than a witness in this litigation.

**22.** I declare under penalty of perjury that the foregoing is true and correct.

Further affiant sayeth not, this the 14 day of December, 2019.

A handwritten signature in black ink, appearing to read "Dr. Keme Hawkins", written over a horizontal line.

Signature

Dr. Keme Hawkins

Exhibit A  
Email Correspondence with Dekalb Board of Elections  
September 24, 2019

From: **Keme Hawkins** <[hawkins.keme@gmail.com](mailto:hawkins.keme@gmail.com)>  
Date: Tue, Sep 24, 2019 at 9:16 PM  
Subject: Re: Change of Address on Voter Registration  
To: Drake, Wanda <[wmdrake@dekalbcountyga.gov](mailto:wmdrake@dekalbcountyga.gov)>

Thank you so much Ms. Wanda for the speed and care with which you have handled this situation.

I just believe it is so important to be vigilant about confirming my voter registration especially with all of the news of voter purging and voter suppression happening in key battleground states like Georgia.

There are important election coming up and I want to make sure I am able to participate.

Please make sure you and your family as well as your community are also eligible to participate in their civic duties.

Thank you and God bless you!

Best,  
Keme Hawkins, Ph.D.

Sent from my iPhone

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> On Sep 24, 2019, at 5:28 PM, Drake, Wanda <[wmdrake@dekalbcountyga.gov](mailto:wmdrake@dekalbcountyga.gov)> wrote:  
>  
>  
> Good afternoon, Ms. Hawkins, attach is a copy of your registration card. The record has been updated. The original card will take 3 to 4 week for you to receive in the mail. If you need to contact me please feel free.  
>  
>  
> Wanda Drake  
> 4380 Memorial Drive, Suite 300  
> Decatur, GA 30032

> 404-298-4028  
> [wmdrake@dekalbcountyga.gov](mailto:wmdrake@dekalbcountyga.gov)

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> -----Original Message-----

> From: Keme Hawkins [mailto:[hawkins.keme@gmail.com](mailto:hawkins.keme@gmail.com)]

> Sent: Tuesday, September 24, 2019 4:40 PM

> To: Drake, Wanda

> Subject: Change of Address on Voter Registration

>

> Dear Ms. Wanda,

>

>

> My name Keme Hawkins

>

> I would like to change my address on my voter registration to:

>

> 5070 Peachtree Blvd Unit 1203

> Chamblee, Ga 30341-2881.

>

> I also filled out a change of address form online with the reference number:

> 1268568.

>

> I believe my address was fraudulently changed to an erroneous address of Peachtree Industrial Boulevard in an attempt to suppress my vote.

>

> Please make these changes as soon as possible.

>

> Thank you,

> Keme Hawkins

>

> Sent from my iPhone



Exhibit B  
Letter from DeKalb County Board of Elections  
November 2019

DEAR VOTER:

**YOUR COUNTY BOARD OF REGISTRARS IS UPDATING ITS VOTER REGISTRATION LIST**

The attached confirmation notice has been sent in response to one of the following:

- 1) You have filed a change of address form with the U.S. Postal Service,
- 2) You have not voted or updated your voter registration in at least 3 years, or
- 3) Official election mail has been returned when sent to the address on your voter registration record.

**PLEASE NOTE:** This confirmation notice was sent to the current mailing address on your voter registration record. **The county you are currently registered in is shown in both the mailer portion of this notice and return portion of this notice.**

- (1) If you still live at the same address as shown on the current voter registration file, complete the attached card and return within 30 days.
- (2) If you have moved to an address within the county that is different from the address currently on file, complete the attached card and return within 30 days. A new precinct card will be mailed showing your new voting location.
- (3) If you have moved from the county in which you are currently registered to an address outside such county, please complete and return the form below within 30 days. If your new residence address is within Georgia but outside the county where you are currently registered, your voter registration file shall be transferred to the county of your new address. If your residence address is outside the State of Georgia, your name will be removed from the list of electors.

**(4) If you do not return the attached card within 30 days, you will be moved to an inactive status.** Your voter registration will be canceled if you DO NOT update your voter registration or vote in an election up to and including the second November General Election held after you are placed on the inactive list.

If you have questions, please contact your County Board of Registrars at the address shown on the outside of this mailer or the Secretary of State's office at 404-656-2871. Visit our website at [www.sos.ga.gov/elections](http://www.sos.ga.gov/elections) for information on elections and voter registration.

If you have moved out of state, please visit [www.eac.gov/voter\\_resources/contact\\_your\\_state.aspx](http://www.eac.gov/voter_resources/contact_your_state.aspx) to find out how to register to vote in your new state.

To confirm or update your voter registration information, please fill out the card below in ink.

Fold and seal as instructed. No postage necessary.

**RETURN WITHIN 30 DAYS!**

TO RETURN: 1) REMOVE TOP 1/2" STUB, 2) FOLD TOP PANEL DOWN,  
 3) MOISTEN AREAS BELOW AS INSTRUCTED, 4) FOLD BOTTOM PANEL UP,  
 THEN 5) APPLY PRESSURE AT THE GLUE AREAS TO SEAL.



For Android

From the Secretary of State website, [www.sos.ga.gov](http://www.sos.ga.gov), a registered voter with a valid Georgia driver's license or identification card issued by the GA Department of Driver Services may change his or her name or address using Online Voter Registration. You may also access Online Voter Registration by downloading the GA SOS app.

Visit our website @ [www.mvp.sos.ga.gov/MVP](http://www.mvp.sos.ga.gov/MVP), download the GA SOS app or contact your local registrar's office.



For Apple

IN ORDER TO MAINTAIN YOUR PRIVACY, DO NOT SEPARATE THE CARD BELOW FROM THIS SECTION!  
 (CVT17-1CT20)

(FILL IN ALL BOXES ON THIS FORM. USE INK ONLY! (DO NOT USE PENCIL))

>>> Do not separate this card from the section above! See instructions above. <<<

Please update / confirm my voter registration within current county of registration:

Your Name (as appears on this mailer):		Valid GA Driver's License or GA I.D. No.: Registered	
		<div style="border: 1px solid black; width: 100px; height: 20px; margin: 0 auto;"></div>	
Present Name (if different from name on this mailer):		Last 4 Digits of Social Security Number: Optional	
		<div style="border: 1px solid black; width: 100px; height: 20px; margin: 0 auto;"></div>	
Date of Birth:	Phone (Optional):	Residence County:	Inside City Limits: Yes <input type="checkbox"/> No <input type="checkbox"/>
Residence Street Address: <small>(See instructions for voters who are moving outside current county of registration)</small>	Apt. #	City	State      Zip Code
Mailing Address (if different from residence):	Apt. #	City	State      Zip Code
Military or Overseas      Yes <input type="checkbox"/> No <input type="checkbox"/>			

X

Signature:

Date:

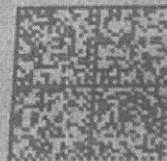


To Open This Side - Slide Finger Under This Edge

DEKALB COUNTY VOTER REGISTRATION  
4380 MEMORIAL DRIVE Suite 300  
DECATUR GA 30032 - 1239

PHONE: 404-298-4020

REG# 07527403  
KEME LATOYA HAWKINS  
5070 PEACHTREE BLVD UNIT # 1203  
CHAMBLEE GA 30341



U.S. POSTAGE >> PITNEY BOWES  
ZIP 30032 \$ 000.50  
02 4M  
0000341892 NOV 15 2

Exhibit C  
Email from Twyla Hart  
December 5, 2019

**From:** "Hart, Twyla I." <tihart@dekalbcountyga.gov>  
**Date:** December 5, 2019 at 9:47:56 AM EST  
**To:** "hawkins.keme@gmail.com" <hawkins.keme@gmail.com>  
**Cc:** "Drake, Wanda" <wmdrake@dekalbcountyga.gov>  
**Subject: FW: Voter Registration Confirmation Mailer**

Good Morning Ms. Hawkins,

The following is the recap per our conversation yesterday morning.

1. Your Department of Driver Services' voter registration application dated 6/11/2018 was process with error, the street name. The application was processed with the address 5070 Peachtree Industrial Blvd. which should have been Peachtree Blvd.
2. The error was discovered and corrected on 9/24/2019, however the mailing address was not changed. Resulting in a precinct card being mailed to the incorrect address.
3. On 9/25/2019 your Online application dated 9/24/2019, was processed updating the mailing address as well.
4. On or before 10/30/2019 the precinct card that was generated on 9/24/2019 was returned to our office and a returned mail confirmation notice was sent to you, which you received. It may take months before returned mail is received in our office, which is why you received the confirmation notice two months later.
5. Your status did not change you remained an active voter in DeKalb County and your registration status was not jeopardy of being cancelled.
6. I have attached a copy of the No Contact in Two General Elections Confirmation Notice to confirm your Confirmation Notice is different.
7. Your current registration is active; however, you will complete and return Confirmation Notice.

Again, I apologize for any inconvenience this may have caused you. Thank you for giving us the opportunity to explain what happened. If you have any additional questions or if we can be of further assistance feel free to contact our office.

Best Regards,

Twyla Inez Hart | Registration Supervisor  
DeKalb County Registration and Elections  
Office: 404/298-4024 | Fax: 404/298-4038  
tihart@dekalbcountyga.gov  
www.dekalbvotes.com

